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June 14, 2018

VA ECF

Honorable Gabriel W. Gorenstein, U.S.M.J.
United States District Court
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: Ritani, LLC v. Harout Aghjayan, et. al.
Civil Action No. 1:11-cv-08928 (CWG)

Dear Judge Gorenstein:

My firm represents the Defendants in the above-referenced action. We write, jointly with Plaintiff's counsel, to provide Your Honor with the joint report on the status of discovery that is due on June 14, 2018. At the most recent proceeding before Your Honor, the parties had two outstanding discovery issues.

First, Plaintiff contended that certain documents from Defendants' Edgewater facility had not previously been produced. Your Honor requested confirmation from Defendants of whether those documents identified by Plaintiff were in fact previously produced by Plaintiff, Defendants, or a third party. Pursuant to my March 14, 2018 letter (*Dkt.* 289) and Your Honor's order, Defendants confirmed that all of the documents identified by Plaintiff were previously produced by Plaintiff or a third-party. On June 13, 2018, Plaintiff identified new documents to Defendants from the Edgewater facility that allegedly had not previously been produced by Plaintiff, Defendants, or a non-party, inclusive of the specific document requests to which the identified documents would have been responsive. Defendants are currently reviewing the documents identified and Plaintiff's position concerning this alleged issue. The parties will address that issue during the next scheduled status report to the Court.

Second, Defendants were required to produce two batches of documents identified as "Feb17 folder" and "Exhibit 24" documents. Defendants provided Plaintiff with those documents on June 11, 2018. Plaintiff's counsel is in the process of reviewing those documents. By the date

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the next status report is due, July 5, 2018, the parties should know of any issues arising out of the production of these documents.

Thank you for Your Honor's consideration of this matter.

Respectfully submitted,

/s Michael J. Lauricella

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cc: Cameron S. Reuber, Counsel for Plaintiff (Via ECF)